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January 8, 2025

VIA ECF

Hon. Philip M. Halpern
United State District Court, Southern District of New York
300 Quarropas Street, Room 530
While Plains, New York 10601

Re: Chang v. Shen Yun Performing Arts, Inc., et. al. (No. 24-cv-08980)

Dear Judge Halpern:

This firm represents Defendants Hongzhi Li and Rui Li. I write to request an extension of time for the Lis to answer or otherwise respond to the Complaint to February 19, 2025.

According to the affidavits of service filed by Plaintiff, the Lis were purportedly served on December 20, 2024. Without waiving any arguments concerning the validity of service, assuming a December 20 service date, the Lis response to the Complaint would be due on or before January 10, 2025. Because our firm was just retained to represent the Lis and given the complex factual and legal nature of the allegations in the Complaint, we request additional time to evaluate and respond to the Plaintiff's allegations. This is the Lis' first request for an extension of their time to respond to the Complaint. The requested extension would also align the Lis' response deadline with the response deadlines of the other Defendants. Plaintiff's counsel has advised that Plaintiff does not oppose the requested extension.

Respectfully submitted,

S:/Kristina Reliford

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cc: All counsel of record (via ECF)